

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Civil Action No. 18-cv-5587

Plaintiff,

Hon. John Z. Lee

v.

Magistrate Judge Young B. Kim

EQUITYBUILD, INC.,  
EQUITYBUILD FINANCE, LLC,  
JEROME H. COHEN, and  
SHAUN D. COHEN, Defendants.

**SUBMISSION OF LIBERTY EBCP, LLC IN RESPONSE TO DOCKET ENTRY 387**

Liberty EBCP, LLC (“*Liberty*”), by its counsel, Jaffe, Raitt, Heuer & Weiss, P.C. files this Submission of Liberty EBCP, LLC in Response to Docket Entry 387.

| Matter/Order  | Objection  |
|---|--|
| Memorandum Opinion and Order dated May 2, 2019 (R. 353) | Objection of Liberty EBCP, LLC to Memorandum Opinion and Order dated May 2, 2019 (R. 359). |

Respectfully Submitted,

/s/ Jay L. Welford

Jay L. Welford (P34471)  
Jaffe, Raitt, Heuer & Weiss, P.C.  
27777 Franklin Rd., Ste. 2500  
Southfield, MI 48034  
(248) 351-3000  
jwelford@jaffelaw.com  
*Counsel for Liberty EBCP, LLC*

Date: June 4, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2019, I provided service of the foregoing *Submission of Liberty EBCP, LLC in Response to Docket Entry 387*, via ECF filing to all counsel of record, and via electronic mail or U.S. mail to the following individuals and entities:

Jerome and Patricia Cohen  
1050 8<sup>th</sup> Avenue N.  
Naples, FL 34102  
[jerryc@reagan.com](mailto:jerryc@reagan.com)  
*Defendant*

First Bank  
Client Contact Center  
600 James S. McDonnell Blvd.  
St. Louis, MO 63042

/s/ Jay L. Welford

Jay L. Welford (P34471)  
Jaffe, Raitt, Heuer & Weiss, P.C.  
27777 Franklin Rd., Ste. 2500  
Southfield, MI 48034  
(248) 351-3000  
[jwelford@jaffelaw.com](mailto:jwelford@jaffelaw.com)  
*Counsel for Liberty EBCP, LLC*